



Gold Fields District
7806 Folsom-Auburn Road
Folsom, CA 95630

May 14, 2009

Delores Brown
Division of Environmental Services
California Department of Water Resources
901 P Street, Bonderson Building, 4th Floor
PO Box 942836
Sacramento, CA 95814

Dear Ms. Brown,

This letter is in response to the Notice of Preparation (NOP) for the Bay Delta Conservation Plan (BDCP) Environmental Impact Report/Environmental Impact Statement (EIR/EIS) (SCH#2008032062). This project may include the development of new conveyance and diversion facilities, habitat restoration projects, changes in the operation of both the Central Valley Project and the State Water Project within the Delta, projects (such as tidal gates) to improve salinity conditions and other potential facilities.

The Gold Fields District of California State Parks owns and/or manages five State Park units or properties within the BDCP project area. These park properties include Delta Meadows, the Locke Boarding House, Brannan Island State Recreation Area (SRA), Franks Tract State Recreation Area and State Park property within the Stone Lakes Wildlife Refuge which is managed by the U.S. Fish and Wildlife Service. All of these park properties could be affected directly or indirectly by the BDCP project. Additionally, the Gold Fields District manages Folsom Lake State Recreation Area, which could be affected by the BDCP Project if the BDCP Project results in changes to the operation of the Folsom Dam and Reservoir which is part of the Central Valley Project (CVP).

State Parks concerns with the BDCP Project broadly include potential impacts to recreation use and facilities, impacts to the natural and cultural resources within all of these park units, and the potential loss of portions of the State Park units within the Delta to the facilities proposed as part of the BDCP Project. Below are some specific concerns regarding the park units within the Gold Fields District.

Delta Meadows is a 470-acre property adjacent to the Town of Locke and along portions of Snodgrass and Meadows Sloughs. State Parks acquired and manages the property primarily to preserve and protect one of the last remaining areas of the northern Sacramento-San Joaquin River Delta that exhibits remnants of the natural conditions that existed prior to Euro-American Settlement. The property contains important riparian and oak woodland habitat. Delta Meadows is enjoyed by an estimated 10,000 to 12,000 visitors annually. State Parks is concerned with the potential

impacts of BDCP project construction and operation on the natural resources of the Delta Meadows property.

The Locke Boarding House is an historic structure within the Town of Locke which was acquired by State Parks in 2005. State Parks has restored the Boarding House and it now serves as a visitor and interpretive center in the Town of Locke. State Parks is concerned with the potential impacts to access to the Locke Boarding House due to traffic and circulation impacts during the construction phase of BDCP Project facilities.

Brannan Island SRA is a 336-acre park unit on the southern end of Brannan Island which provides camping, picnicking, boat launching and other recreation activities to approximately 130,000 visitors annually. Brannan Island is an important recreation amenity in the Delta region. State Parks is concerned that the BDCP Project could impact recreation use and facilities at Brannan Island SRA either directly or indirectly, both during construction of BDCP facilities and during operation.

As part of the Franks Tract Project, the Department of Water Resources has already initiated planning and is considering locating one or more tidal gates which could directly or indirectly impact recreation use and facilities at Brannan Island. State Parks submitted a November 20, 2008 letter to DWR in response to the NOP for that project (SCH #2008092081). State Parks is unclear regarding the relationship of the Franks Tract Project and the BDCP Project, which also seems to include the potential for tidal gates in the vicinity of Brannan Island SRA. If the BDCP project is now encompassing the proposals made in the Franks Tract Project, please consider November 20, 2008 letter sent to DWR regarding the Franks Tract Project as part of our comments for this NOP. A copy of this letter is attached.

Franks Tract SRA is a 3,500-acre property consisting primarily of two flooded islands within the Delta, Franks Tract and Little Franks Tract. All types of boating, fishing, waterfowl hunting are the primary recreation activities at Franks Tract SRA. Visitation is estimated to be between 15,000 to 20,00 visitors annually. Again, State Parks is concerned how the BDCP may impact recreation use at Franks Tract. It is our understanding that tidal gates or other types of operable barriers across some of the sloughs connected to Franks Tract may be considered as part of the BDCP Project.

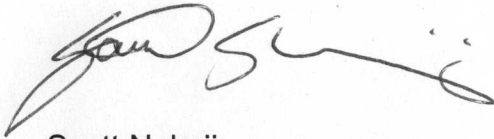
Folsom Lake SRA is comprised of the 17,300 acres of federal property around Folsom and Nimbus Dams and the two reservoirs, Folsom Lake and Lake Natoma. The SRA also includes an additional 2,200 acres of State-owned lands. California State Parks manages Folsom Lake SRA through an agreement with the U.S. Bureau of Reclamation. Folsom Lake SRA is one of the most heavily visited park units in the State Park System with approximately 1.5 million visitors annually. The SRA provides a wide range of recreation opportunities and facilities, but water dependent recreation activities account for about 85% of the park visitation. The extent of lake access and the quantity and quality of aquatic recreation opportunities available at Folsom Lake are directly connected to the operation of the reservoir and Folsom Lake levels, particularly during the primary recreation season, from April through October. To the extent that the BDCP Project could result in changes in CVP operations which would affect Folsom Lake levels, State Parks is extremely concerned about potential impacts on recreation and revenues.

Because the BDCP Project potentially involves State Park units, as delineated in the California Environmental Quality Act Guidelines (Section 15386), California State Parks is a trustee agency for the park units within the State Parks system and may also be a responsible agency for this project.

California State Parks requests that the lead agencies, DWR and Reclamation, consider both the direct and indirect impacts to recreation to all of the State Park units potentially affected by the BDCP, both during construction and operation. This could include direct use of State Park lands for BDCP facilities, temporary and permanent impacts to recreation use resulting from changes to traffic routes and circulation, impacts to recreation use and water access due to operable barriers or other facilities on waterways connected to State Park units. Additionally, State Parks requests that the potential impacts to the natural and cultural resources of any affected State Park units are addressed in the environmental analysis. Potentially significant effects, to recreation or resources, would need to be mitigated.

If you have any further questions regarding this matter, please contact the Gold Fields District Planner Jim Micheaels at (916) 988-0513. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Nakaji", written in a cursive style.

Scott Nakaji
District Superintendent



Gold Fields District
7806 Folsom Auburn Road
Folsom, CA 95630
(916) 988-0205, FAX (916) 988-9062

November 20, 2008

Mr. Ajay Goyal, Project Manager
California Department of Water Resources
1416 Ninth Street, Room No. 252-18
Sacramento, CA 94236-001

RE: Notice of Preparation, Environmental Impact Statement/Environmental Impact Report for the Franks Tract Project – SCH #2008092081

The purpose of this letter is to provide comments regarding the Notice of Preparation for the Franks Tract Project for the Gold Fields District of California State Parks. The Gold Fields District manages Brannan Island State Recreation Area (SRA) and Franks Tract State Recreation Area. The Franks Tract Project is assessing five potential locations for flow control gates in the Delta, along Three Mile Slough and False River. Two of the proposed locations would directly involve portions of Brannan Island SRA. State Parks staff has had several meetings with Department of Water Resources (DWR) project managers regarding the Franks Tract Project. State Parks has granted a right of entry permit to DWR data gathering and geotechnical investigations at Brannan Island SRA associated with the environmental review of this Franks Tract Project.

State Parks supports the goals of the Franks Tract Project of improving the water quality conditions in the Delta and protecting and enhancing for fish species of concern which are dependent on the Delta environment. However, this project does have the potential to impact both existing and future recreation use and facilities at Brannan Island SRA and Franks Tract SRA.

Affected State Park Units

Brannan Island SRA is 328 acres of land owned by State Parks located at the confluence of Three Mile Slough and the Sacramento River. The average visitor attendance at Brannan Island SRA over the past dozen years is 130,000 visitors annually. Facilities at Brannan Island include a six lane paved boat ramp and parking, a small marina, a developed campground with 140 sites, a large group picnic area, a day use picnic and beach area, a group campground and a small visitor center. Camping, picnicking, swimming, beach use, and boating access for fishing and other aquatic recreation are all important recreation activities at Brannan Island SRA. The management of Brannan Island SRA is guided by several planning documents including the "General Plan for Brannan Island and Franks Tract State Recreation Areas" (February 1988) and the "Recreation Assessment, Brannan Island State Recreation Area" (June 2008). State parks can provide copies of these documents to DWR.

Franks Tract is 3,522 acres of primarily water, a flooded former reclaimed Delta island, also owned by State Parks. Franks Tract is only accessible via boat and the primary recreation uses are fishing and waterfowl hunting. Over the past twelve years attendance at Franks Tract has averaged 14,000 visitors annually.

As delineated in the California Environmental Quality Act Guidelines (Section 15386), California State Parks is a trustee agency for the park units within the State Parks system and may also be a responsible agency for this project.

Potential Land Use and Construction Impacts

As previously mentioned, two of the proposed flow gate locations would involve lands within Brannan Island SRA along Three Mile Slough and would have impacts to existing and future facilities and uses. Site 2 in the Franks Tract NOP would have impacts to the existing campground at Brannan Island SRA. Site 1 would impact an existing dirt service road which is used as an informal trail. Fishing and other informal use of the Three Mile Slough shoreline occurs in the area of both Sites 1 and 2. Use of Site 1 may have impacts to potential future facilities and use of this area for group camping area or trails. In addition to the potential direct impacts to facilities and future use of these areas for the purposes of the SRA, the construction of the flow gate facility may have impacts on public access to and recreation use of Brannan I SRA.

The construction of the gate facility at either Site 1 or 2 may involve impacts to vegetation within Brannan Island SRA, including elderberry which is the host of the federally listed Valley Elderberry Longhorn Beetle.

Potential Operational Impacts – Boating and Recreation Use

State Parks understanding of the operation of the flow gates is that they may be closed on a daily basis for periods of hours depending upon tides and season. We also understand that the gates would include a lock system to allow boating traffic to pass through the gate when closed. The operation of the gates, including the delays involved in use of the lock, has the potential to have substantial impact to recreational boating traffic along Three Mile Slough and the use of Brannan Island SRA as a launching point. This could have long term impact to the recreation use of Brannan Island SRA which in turn would impact revenues generated from park user fees. A gate facility at Sites 1 or 2 may affect the quality of the camping and other upland recreation experiences at Brannan Island SRA, including noise, lighting and other issues associated with the facility.

The operation of the flow gates could also impact boating access to and use of Franks Tract SRA, particularly if a gate were constructed at the False River site.

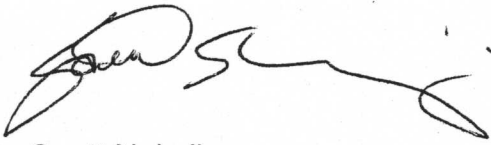
Mitigation for Impacts to Recreation Use and Facilities

State Parks believes there may be options to mitigate the impacts to recreation use resulting from project construction and operation. This could include development of new recreation facilities or improvements to existing facilities at Brannan Island SRA such as assistance with the development of a new small visitor center or other improvements to the existing day use or overnight facilities. State Parks believes that interpretation and education regarding the purpose of the flow gate, the resources it is designed to protect and the complex ecology, hydrology and human use of the Delta would help the recreating public better understand and accept the flow gate facility which will have impacts on recreation and boating use. A new visitor center would provide a better opportunity to provide this education and interpretation. State Parks could envision an ongoing partnership or collaboration with DWR regarding such a visitor center. Another option is to provide improved facilities for boating, such as improvements to the boat launch or marina which may help mitigate impacts to boating use. State Parks is interested in further exploring

mitigation possibilities with DWR.

State Parks looks forward to working with DWR and participating in the environmental review process for this project. If you have any questions regarding this letter, please contact Jim Micheaels, Senior Park and Recreation Specialist on the Gold Fields District at (916) 988-0513. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Nakaji', with a long horizontal flourish extending to the right.

Scott Nakaji
District Superintendent